

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-80219-CR-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL GORDON DOUGLAS,

Defendant.

\_\_\_\_\_:

**NOTICE OF REQUEST FOR DISCLOSURES OF  
EXPERT WITNESS SUMMARIES**

The defendant, through undersigned counsel, files this notice of request for disclosures of expert witness summaries pursuant to Fed. R. Crim. P. 16(a)(1)(G) and paragraph N of the Standing Discovery Order. The defendant requests disclosure of expert testimony the government intends to introduce at trial during its case-in-chief. As to each potential expert witness, the government should disclose the name of the expert witness, the witness' qualifications, present employment, a summary of the witness' opinion, and the bases and reasons for the opinion. *See, e.g., United States v. Ortega*, 150 F.3d 937, 943 (8<sup>th</sup> Cir. 1998) (agent's

testimony, involving specialized knowledge of drug-related activities and paraphernalia, was expert opinion subject to disclosure).

Respectfully submitted,

HECTOR A. DOPICO  
Federal Public Defender

*s/ Scott Berry*

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Scott Berry  
Scott Berry